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April 15, 2025

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Courtroom 14A  
New York, NY 10007-1312

Re: **Michael Buxbaum v. Robert C. Gottlieb & Associates, PLLC**  
**Case No. 1:25-cv-00509 (JGK)**

Dear Judge Koeltl:

We represent defendant, Robert C. Gottlieb & Associates, PLLC s/h/a Robert C. Gottlieb & Associates, PLLC in this action. Pursuant to the Court's Order dated March 18, 2025 (ECF Doc. No. 32), we will be filing our motion to dismiss pursuant to Fed. R. Civ. P. 12(b) on April 18, 2025.

We anticipate that several exhibits to our motion will consist of filings and orders from the underlying New York State Family Court and Mental Hygiene Law proceedings that are the subject matter of the Amended Complaint and concern the plaintiff, Michael Buxbaum.

While Mr. Buxbaum has indisputably placed those proceedings at issue in this litigation, the filings from those proceedings remain under seal pursuant N.Y. Family Ct Act §166, NY Criminal Procedure Law 160.50 330.20 and NY Mental Hygiene Law Articles 9, 15 and §33.13(c). Several documents also discuss and identify Plaintiff's family members, who are not parties to this litigation.

As such, we seek the Court's permission to file any exhibits to our motion to dismiss related to the underlying family court and mental hygiene proceedings under seal.

Respectfully submitted,

**KAUFMAN DOLOWICH LLP**

  
Brett A. Scher

**APPLICATION GRANTED  
SO ORDERED**

cc: **Via Email**  
Michael Buxbaum - [michaelbuxbaum@icloud.com](mailto:michaelbuxbaum@icloud.com)  
Plaintiff, pro se

  
John G. Koeltl, U.S.D.J.

4/16/25